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Hon. Paul G. Gardephe

United States District Court - SDNY

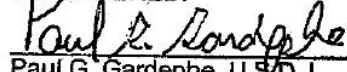
40 Foley Square

NYC, NY 10007

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: April 7, 2020

Re: *United States v. Adel Kellel* (20-CR-00067 [PGG])

REQUEST FOR EXTENSION OF TIME

Dear Judge Gardephe:

I represent the defendant in the above-referenced matter who pled guilty to one count of income tax evasion. Sentencing is tentatively scheduled for May 20, 2020.

On March 26, 2020, I received a draft copy of the proposed PSR from Emily P. Frankelis, Probation Dept. Our objections are due this Thursday, April 9, 2020. However, due to the current Corona virus pandemic, I am unable to meet that deadline and therefore request a fourteen-day extension of time to respond to Probation. Specifically, on Friday I was informed by the Federal Defenders (confirmed by AUSAs on the cases) that I have two clients at the MDC in Brooklyn who have been designated by the BOP (following CDC protocols) as being "High Risk" for morbidity or serious illness if exposed to COVID-19. Trying to get those two inmates out of MDC and onto home confinement until the pandemic subsides has been my top priority the past few days. I filed one motion today (in *United States v. Mark Krivoi*, Dkt. No. 18-CR-100 (EDNY – Vitaliano, J.)); and I am feverishly (no pun intended) working on the other (in *United States v. Christopher Robinson*, Dkt. No. 18-CR-420 (EDNY – Hurley, J.)). I expect to have Robinson's papers filed by Wednesday. But I am left unable to complete a response to Mr. Kellel's PSR by Thursday. Please grant me until to April 23, 2020 to file our objections. No prior request for this relief as ever been made.

Respectfully,

/s/ Richard M. Langone

RICHARD M. LANGONE

Cc: EMILY P. FRANKELIS (Service by ECF)
AUSA OLGA ZVEROVICH (Service by ECF)
AUSA JORGE ALMONTE (Service by ECF)